



PSA 25
City of Los Angeles
Department of Aging

MONITORING REPORT

February 22-26, 2010



California Department of Aging (CDA) Staff

An onsite assessment of the City of Los Angeles, Department of Aging (LADOA) was conducted by CDA staff from February 22-26, 2010. The following CDA Staff were present:

Don Braeger	Policy Manager	Long Term Care and Aging Services Division
Eura Trent	Aging Programs Specialist	Administrative Services
Mame Polito Lilit Tovmasian	Data Program Specialist	Data
Anthony Perez	Fiscal Program Specialist	Fiscal Program Services
Joel Weeden	FCSP Specialist	Title III E Family Caregiver Support Program
Donna DiMinico	Aging Programs Analyst	
Barbara Estrada, R.D.	Public Health Nutritionist	Title III C Elderly Nutrition Program and Title III D Disease Prevention and Health Promotion
Scott Crackel	Aging Programs Specialist	Title III-B Supportive Services, Information and Assistance and Disaster Preparedness
Phillip Carr	Title V Program Specialist	Title V-Senior Community Services Employment Program (SCSEP)
Ross Kaplan	HICAP Program Specialist	Health Insurance Counseling and Advocacy Program (HICAP)
Mark Meis	HICAP Program Specialist	

Monitoring Report

Throughout the monitoring report, City of Los Angeles, Department of Aging (LADOA) or Area Agency on Aging (AAA) is used to refer to the City of Los Angeles, Department of Aging. In every instance, the two terms are synonymous. CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA) and Older Californians Act (OCA). This report includes:

- Recap of the standards monitored during the visit;
- Recognition of any identified best practices or models of service delivery that will be shared with the aging network by a notice posted on CDA's website;
- Findings and required actions to be taken by the LADOA to correct specific findings associated with the monitoring visit; and
- Corrective Action Plan to be completed by LADOA and submitted to CDA.

RECAP/OVERVIEW OF MONITORING VISIT

This section provides a recap of the standards reviewed during the monitoring visit and identifies AAA staff that assisted CDA to accomplish its work.

AAA Administrative Review

Governing Board

Don Braeger and Eura Trent met with City Councilman Tom LaBonge, Chair of the Governing Board; Lisa Schechter, Legislative Deputy; Laura Trejo, General Manager; James Don, Assistant General Manager; Marco Perez, Deputy Director, and Patricia Wilson, Advisory Council Chair to ensure the Governing Board understands its responsibility to develop a coordinated community-based system of care for older persons living within Planning and Service Area (PSA) 25. The meeting focused on the relationship, coordination, communication, and support between the Board and the PSA.

Ms. Trejo described the collaborative relationship between the Board and the PSA and how the Board supports the PSA's community efforts. Ms. Schechter described how documents are routed to the Chair for approval and how the Board expedites approvals to support the PSA. The PSA and their Board appear to have a good working relationship and adequate processes in place to ensure Board approval for administrative, fiscal, and programmatic requirements.

Advisory Council

Don Braeger and Eura Trent met with Patricia Wilson, Advisory Council Chair, Laura Trejo, General Manager; and Marko Perez, Deputy Director to determine if the Advisory Council is provided the opportunity to; (1) advise the Area Agency on Aging (AAA) on all matters related to the development and administration of the Area Plan and all operations conducted under the plan, and; (2) further the AAA's mission of developing a comprehensive coordinated community-based system of services for older persons living within PSA 25. The Council on Aging (CoA) is the Advisory Council to the LADOA and is comprised of 25 members representing all groups required under State and Federal law; including veterans. Ms. Wilson expressed she has an excellent working relationship with Ms. Trejo. Ms. Wilson and Ms. Trejo meet at least weekly to converse about issues concerning CoA.

Ms. Wilson attends most of the committee meetings and reports on CoA activities monthly at LADOA staff meetings. CoA committees include a cross section of CoA members, LADOA staff, community members, committees, and service providers. Each committee is charged with a specific responsibility including developing and monitoring projects. For example, the Arts and Entertainment Committee advocates for the citywide senior art program. The exhibit is held at the Bridge Gallery in City Hall, the Arts and Entertainment committee hosts the Annual Senior Art Exhibit. The senior art exhibit displays the work of non-professional senior artists and has developed a full color catalog of the seniors' art.

The Advisory Council has partnered with ScanHealthcare to donate Nintendo Wii machines for several multipurpose centers (MPC). The Wii machines encourage seniors to engage in physical activities to improve mobility and challenge their thinking skills with trivia games.

The Advisory Council works collaboratively with the PSA to promote services to seniors by assisting in annual needs assessments. The Advisory Council members participate in the needs assessment by going out into the community to distribute survey information and work with the PSA to identify future areas of focus.

The CoA produced a colored pamphlet used to recruit new council members. The pamphlet explains the purpose of CoA and gives a brief description of services and projects. It was evident that the CoA is a formidable advocate for seniors in the City of Los Angeles.

Staffing and Organization

Eura Trent met with Dale Osborne, Senior Management Analyst I, to determine if the AAA has an adequate number of trained staff to administer programs to older individuals living within the PSA. Ms. Trent reviewed the Departments Personnel Procedures manual. The AAA utilizes County and external training resources to enhance job-specific skills of AAA staff. It was determined that personnel practices and procedures have been established and are well maintained.

Procurement/Contract Process

Eura Trent met with Jake Wood, Senior Management Analyst I, to determine if the AAA had established systematic procedures for the award and administration of contracts through an open and competitive process. Request for Proposal (RFP) and service provider contracts contain all required components and are executed in a timely manner. Completed contracts are retained in the AAA's files.

Management of Service Providers

Eura Trent met with Martin Tan de Bibiana, Senior Management Analyst I, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. The AAA distributes information to a network of non-profit service providers through regular email communication, service provider training, and technical assistance. Ms. Trent reviewed contracted service provider files and monitoring tools to determine the AAA conducts onsite monitoring visits regularly. The AAA monitors its service providers contracted activity levels and makes adjustments when necessary.

Data Reporting

Mame Polito and Lilit Tovmasian met with Jake Wood, Senior Management Analyst I, Francisco Guillermo, Management Analyst II, Somapun Pongquan, Management Assistant, and, to review and discuss the data collection and reporting for Title IIIB, Title IIIC1&2, IIID, IIIE, Title VIIB, American Recovery and Reinvestment Act (ARRA) and Community-Based Services Programs (CBSP).

LADOA uses an internally developed client-based data system, Client Tracking System (CTS), produced and maintained by the City of Los Angeles Information Technology Agency (ITA) to collect and report data on OAA programs. The CTS database allows LADOA and providers to enter in client detailed information, link the clients to services and utilized units, and generate reports. In addition to the CTS, LADOA has maintained a Management Information Systems (MIS) to collect OAA and OCA statistics. Data is submitted reviewed by the planning division. LADOA typically submits reports on time.

All subcontractors are required to attend a mandatory meeting, Program Development Task Force, every other month where LADOA gives guidance and discusses changes and issues.

AAA Fiscal Review

Anthony D. Perez met with Gwen Johnson, Accounting Manager, Dale Osborne, Martin Tan Bibiana, Ivy Su, Charles Babby, Jacob Wood, Senior Management Analysts I, to determine if the AAA maintains a financial reporting system that reflects accurate, current, and complete disclosure of the financial activities of the AAA and its service providers. Mr. Perez reviewed each standard of the CDA Fiscal Review tool, examined the service provider contract language for fiscal requirements, and budget specifications, and assessed fiscal monitoring reports prepared by the AAA.

The AAA fiscal staff uses the City's Financial Management Information System (FMIS) to record Contractor payments. AAA fiscal staff uses the Client Tracking System (CTS) to input fiscal data into their Cost Control/Cash Control System to report monthly expenditures for Direct and Contracted services. The fiscal staff also uses an excel spreadsheets to track expenditures and revenues reported to CDA. Mr. Perez reviewed several reported expenditures for November 2009 and tracked expenditures back to the originating invoice. Overall, the AAA maintains proper and adequate systems and documentation.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

The AAA completed the CDA IIIB Supportive Services tool prior to the site visit. Mr. Crackel reviewed this monitoring tool with Martin Tan De Bibiana, Senior Management Analysts I. The AAA utilizes its own monitoring tools to oversee its Title IIIB programs, which was furnished for inspection. The AAA's Title IIIB Supportive Services Program effectively manages its providers, facilitating seniors' access to services through its one-stop community centers.

Scott Crackel met with Charles Shivers, Senior Management Analyst I, to visit a Title IIIB Supportive Services Provider, Senior Outreach, located at St. Barnabas Senior Services Center. Mr. Crackel and Mr. Shivers met with Gordon Gibb, Senior Outreach Director. Senior Outreach receives funding for approximately 2.75 Social Work positions from the AAA, and has been in operation since 1908.

Mr. Crackel met with Alice Schreiman, AAA Management Analyst II, to visit the Assistance League of Southern California (ALSC) Hollywood Multipurpose Senior Center to meet Barbara Linski, Executive Director. This organization provides services in nutrition, personal care, homemaker, case management, outreach, community and consumer services, and information and assistance. Ms. Linski provided Mr. Crackel with sample copies of donation/solicitation letters, client satisfaction surveys, and I&A subject call checklists. ALSC employs one part time staff and multiple screened, trained, and supervised-volunteers, to answer the I&A line during business hours.

Title III B—Information and Assistance (I&A)

Scott Crackel met with Charles Shivers, I&A Program Manager, to discuss I&A service delivery in the PSA. AAA provides both direct and contracted I&A services.

The AAA utilizes a printed packet with color maps for its Resource Directory. These can be mailed to the client as requested. The AAA is referring more and more clients to its web-site for these materials. Mr. Crackel also checked the local telephone books for references to “senior services.” No listings were found for the City of Los Angeles for any of the regions under the PSA in either the local White or Yellow Pages.

During the monitoring visit, Mr. Crackel called the 1-800-510-2020 line during the day and in the evening. Incoming calls are documented on an in-house developed Microsoft Excel Spreadsheet. The Intake Form is comprehensive and is capable of documenting unmet needs and follow-up. Mr. Crackel's call was triaged by the AAA I&A staff person, who inquired about the need and solicited the age of the person in question. After offering several different referrals for assistance, Mr. Crackel's call was forwarded accordingly. After hour-calls go to voicemail.

Disaster Preparedness

Scott Crackel interviewed Dale Osborne, Senior Management Analyst I, regarding AAA disaster preparedness efforts. The geographical area of this AAA is known to be site of many disaster events, including earthquakes, erosion, fires, floods, and riots. The AAA has an effective relationship with both the City and County of Los Angeles Offices of Emergency Services (OES). The AAA and its service providers conduct mock drills based on hypothetical scenarios the county is likely to face in the coming years. This periodic training ensures that through interaction and collaboration the minimum preparedness standards are met. The AAA attempts to incorporate lessons learned wherever possible in preparedness planning. The AAA has an effective disaster preparedness program which foresees the needs of its citizens before, during and after events occur.

Title III C—Elderly Nutrition Program (ENP)

Barbara Estrada, R.D., met with Bertha Hurd, AAA R.D. and Martin Tan De Bibiana, Senior Management Analyst I, to review the ENP monitoring tool. Ms. Estrada assessed the donation procedures, two kitchen production sites, current ENP menu compliance with Dietary Reference Intakes (DRI), Home-Delivered Meals (HDM) policies and procedures, annual monitoring reports, corrective action plans, eligibility

assessments, contracts, quarterly staff training, training evaluations, nutrition education topics, and congregate meal service was observed at seven sites.

Ms. Estrada and Ms. Hurd met with Nadar Poursadeghi, Food Service Director and Carlos Geise, Production Manager to conduct a review of the ENP production kitchen at the Morrison Health Care Associates, located in North Hills. This production kitchen generates 2200 meals per day; the meals are mostly hot with a limited amount of frozen meal assembly. Morrison produces both congregate and home-delivered meals for four Los Angeles Department of Aging (LADOA) ENP contractors; 1) The Assistance League, 2) The Department of Recreation and Parks, 3) The International Institute, and 4) The San Fernando Valley Interfaith Council.

Ms. Estrada and Ms. Hurd also conducted a site monitoring of the Bernardi Multipurpose Center, located in Van Nuys. The Bernardi center is included in the LADOA contract with the San Fernando Valley Interfaith Council meal program and receives their meals from the Morrison Health Care Associates kitchen. The visit included a review of the congregate meal service procedures, donation procedures, HDM eligibility assessments and participants' interviews.

Several centers or meal sites were observed outside of meal service hours. The Alicia Broadous Multipurpose Center in Pocoima was visited outside of meal service hours. The site was an example of a dynamic multipurpose center with many programs including art, Adult Day Care, and the meal programs.

On Wednesday Ms. Estrada and Ms. Hurd performed an evaluation of the Jewish Family Services', Hirsh Kosher Kitchen. This production kitchen supplies a combined total of 250,000 meals per year (about 450 hot congregate and 280 frozen HDMs daily). This unique kitchen facility meets the needs of the kosher community by following kosher dietary laws and additional dietary restrictions during Passover. Food Service Manager, Hugo Perez, explained that in accordance to kosher dietary rules the site serves no liquid milk products, however they do provide powdered milk to the participants to fulfill the calcium requirements. The visit included a review of the home-delivered meal participants' quarterly eligibility assessments.

Several other meal sites were also visited on Wednesday. Wanda Jefferson, Nutrition Director of the Assistance League of Southern California (ALSC) joined Ms. Estrada and Ms. Hurd for observation of other ALSC sites; the Griffith Park Adult Community Center (G-PAC), the Chevy Chase site in Atwater Village, and the Braille Institute providing an opportunity to see a variety of meal services locations in the Planning and Service Area (PSA).

The ALSC Hollywood Senior Multipurpose Center site was a lively senior center meal site. The G-PAC site was located in a trailer permanently placed on the property. The Center includes a library, an exercise room, as well as the ENP meal site.

The Chevy Chase site was situated in a school gym; the tables were decorated with colorful tablecloths and flowers to make the setting appealing.

Congregate meal service was observed at the Braille Institute, the visit included a review of donations procedures and conversations with participants. The participants noted that the increased spacing between the tables accommodates their vision challenges and makes it easier to navigate in the dining room.

On Thursday, Ms. Estrada and Ms. Hurd were joined by Don Braeger and Eura Trent, CDA staff, for three final meal site visits all part of the St Barnabas contract with LADOA. The Golden Dragon, Chinese restaurant provides ethnic meals for seniors five days a week. This site was visited prior to lunch service, the donation procedure was reviewed and several participants were interviewed. The seniors all liked the food and commented on the amount of fruits and vegetables served. The seniors at this site were taking advantage of the opportunity to socialize; the room was filled with the sound of their conversations.

The St Barnabas meal site was located in a room used also as a library, the room was full to capacity. The meal provided by the Ritz Garden Banquet Center had been served prior to the visit.

The Sol Bart Korean restaurant provides Korean ethnic meals for seniors. This restaurant site allowed seniors to dine at their convenience anytime during the lunch hours. Participants that were interviewed were pleased with the meals.

Title III D—Disease Prevention and Health Promotion (DPHP)

Barbara Estrada, R.D., met with Robert Rosenwald, Program Monitor, to review the DPHP monitoring tool. Barbara Estrada, reviewed the RFP, contract, monitoring reports, Area Plan Goals and Objectives, and MIS reports. Title III D funds are allocated to the Partners in Care Foundation to support the provision of health screenings, health counseling and medication management.

Title III E—Family Caregiver Support Program (FCSP)

Joel Weeden conducted an onsite assessment of FCSP direct and contracted services in coordination numerous AAA staff. Donna DiMinico observed the CDA monitoring process as part of her FCSP training.

The review of the AAA Area Planning, procurement, and performance output tracking processes was conducted with Jake Wood, Senior Management Analyst I for the Planning Division; and Francisco Guillermo, Management Analyst II for data reporting.

Delivery of AAA direct FCSP services was reviewed with Charles Shivers, Senior Management Analyst I for the Information and Assistance Division; and briefly with Anat Louis, Social Worker III for the Program Development Division. Ms. Louis was assisted by Susi Rodriguez Shapiro, Social Worker II and primarily involved in the delivery of FCSP Support Services.

Site visits of a few contracted FCSP providers were conducted in order to assess the AAA's performance in contractor oversight and monitoring. Preparation for these sites was conducted with the support of Martin Tan de Bibiana, Senior Management Analyst I for the Program Management Division. Additional assistance was provided by his program management analysts, and by Gwendolyn Johnson, Principle Accountant II for the Financial Services Division. Mr. Weeden and Ms. DiMinico met with the following contractor representatives:

- Bet Tzedek Legal Services – Gus May, Directing Attorney for the Wilshire Office; and Erikson Albrecht, Kinship Care Attorney.
- International Institute of Los Angeles – Vicki Gutierrez, Director; and Cecilia Chavez, Director of Social Services.
- Mexican American Opportunity Foundation – Elizabeth Jimenez, Project Director, Information & Assistance, Services for Seniors, and Home Secure Program

Mr. Braeger joined Mr. Weeden in a special overview meeting conducted with Laura Trejo, General Manager for the Department of Aging; and Marco Perez, Senior Management Analyst II for the Program/Services Operations Division.

Title V—Senior Community Services Employment Program (SCSEP)

Phil Carr met with Charles Babby, Senior Management Analyst I, and Brenda Wells, Host Agency Developer. The AAA provides SCSEP directly and administers 217 participant slots for the regular grant and 50 participant slots for the American Recovery and Reinvestment Act (ARRA) grant. During the visit, Mr. Carr reviewed the CDA SCSEP monitoring tool with Mr. Babby and reviewed thirty-three participant files (nineteen regular files, nine ARRA files, and five closed files).

Mr. Carr's review of the participant files included the following: participant orientation documents, participant individual employment plans, the Memorandum of Understanding (MOU) with the Local Workforce Investment Board (LWIB), participant assessments, and the SCSEP organizational chart. AAA files were organized, but some files were incomplete because they did not have the required documentation.

Mr. Carr interviewed two participants and two supervisors, Karie Chin, Assistant to the Director and Lillian Baranabul, Supervisor. Both the participants and host agency supervisors expressed satisfaction with the SCSEP services they receive.

In addition, Mr. Carr conducted two host agency site visits. The Theodore Payne Foundation for Wild Flowers and Native Plants, Inc is a nonprofit nursery, seed store, and bookstore specializing in California native plants. It provides extensive plant information and advice in the nursery sales yard, through classes conducted on site, and other public service programs. The nursery specializes in using drought resistant plants that require very little water.

Mr. Carr and Don Braeger met with a participant who took them on a tour of the wildflower facility. While on tour they were introduced to two other SCSEP participants. One participant cataloged the nursery's complete collection of flowers. Another successfully obtained an unsubsidized part time position with a local park. He will be using the knowledge and skills gained at his host agency assignment in the position.

The Good Shepherd Center for Homeless Women and Children host agency provides bakery and employment services training. Mr. Carr met with Ray Olivas, Program Coordinator, who gave him a tour of the bakery facility and the employment center. This host agency has one participant working in the bakery training program and one participant working in the employment center.

Specific Program Reports—Older Californians Act Programs

Health Insurance Counseling and Advocacy Program (HICAP)

Ross Kaplan met with Ivy Su, Program Monitor to review the HICAP monitoring tool. Mr. Kaplan determined that Ms. Su conducted an overall program review of the HICAP service provider, the Center for Health Care Rights (CHCR). The standards applied were the core elements of the statewide HICAP Monitoring Instrument which are: Management/Personnel/Operations; Recruitment and Recognition of Volunteers; Training, Records, Community Education, Client Counseling, Legal Referral, Marketing / Publicity and MIS Procedures.

Ross Kaplan and Mark Meis met with Martin Tan De Bibiana, Senior Management Analyst I, visited the CHCR office to meet with Aileen Harper, Executive Director, and Sandy Risdon, HICAP Program Manager. CHCR staff provided a tour of the facility and introduced CDA staff to outreach, marketing and case specialists.

FINDINGS REQUIRING CORRECTIVE ACTION

Included below is a formal description of findings that led to the corrective actions detailed in the Report of Required Corrective Actions (see attached) presented at the Exit Conference conducted by CDA on February 26, 2010. For your convenience, specific corrective actions to be taken by the AAA are summarized in a Corrective Action Plan (CAP) format that is included as part of this report. The CAP will be transmitted electronically to the AAA to ease completion and submission to CDA.

AAA Administrative Review

Staffing and Organization

To verify accuracy of paid personnel costs by position title and funding category, CDA staff reviewed the AAA's current organizational chart. The current organizational chart did not clearly specify the percentage of full-time equivalent for each position and funding source according to the personnel pages of the Area Plan Budget. [CCR Section 7318(h)(1)]

Corrective Action: Ensure the organizational chart identifies the minimum percentages of funding charged to specific programs for each AAA staff.

Management of Service Providers

The AAA effectively communicates information regarding service provider monitoring visits to their staff. However, the AAA does not have documented administrative procedures related to their monitoring practices. This includes procedures for following up with service providers that are non-compliant. [CCR 7250(b)(1)(2)]

Corrective Action: Update and/or establish administrative procedures that include a documented process; detailing how issues are communicated and documented for all of all activities related to the monitoring process.

The AAA monitors multiple service providers/programs at one time. Upon review of this system, was not able to verify a written process was in place to ensure all contracted service providers are monitored annually as stated in AAA contract. In addition, service provider monitoring reports did not appear to be a complete document including all required documentation according to program. [CCR 7250(2)(4)]

Corrective Action: Ensure a written process is in place to verify all service providers are monitored annually and monitoring reports are complete and filed for all programs.

Donation letters from the AAAs service providers were reviewed to ensure the request include required language. Consistently across all Title III programs this requirement was not met.

Corrective Action: Ensure all requests for donations include a statement to clearly inform each participant there is no obligation to contribute. Donations are voluntary and services will not be denied if a contribution is not made.

Data Reporting

CDA reviewed the Service Unit report for FY 2008-09, it was discovered that not all providers use the CTS system for Registered Services. LADOA is under reporting the number of Registered clients served and service units. For Home Delivered Meals and Congregate Meals, LADOA is reporting an accurate meal count, however, the number of Registered clients tied to a meal is very low. [AoA-PI-96-01 and AoA-PI-97-11, CDA PM 08-04 (P), and OAA, Section 207]

Corrective Action: Create procedures and ensure accuracy of data into CTS by all service providers.

Currently, the Planning Division tracks data, the Program Monitoring Division conducts program and data assessments, and the Program Development Division provides program technical assistance and guidance. There were no written procedures regarding the roles and responsibilities of each unit regarding data. There were no written procedures to how data is validated for accuracy, nor procedures for how questionable data is recorded and corrected. [CCR 7250(1)(B)]

Corrective Action: Develop a method to ensure proper review and records of questionable data, and corrective reports findings to providers.

AAAs must have the capability to register clients at the point of service. Using CARS the AAA needs to capture data on each client using Registered Services, and each unit of service used by the client. CDA is concerned with the amount of missing data. LADOA response was that the clients refuse to provide the data. LADOA is working with its providers to capture more client data so that a more accurate report can be produced and to ensure that its reporting requirements are met. [AoA-PI-96-01 and AoA-PI-97-11, CDA PM 08-04 (P), and OAA, Section 207]

Corrective Action: Develop a process to ensure that reports are submitted accurately and completely into CARS in a timely manner.

LADOA current formula for determining an Estimated Unduplicated count of Non-Registered clients is to take the total yearly count from Information and Assistance, and Outreach contacts. LADOA captures Information and Assistance on an excel spreadsheet with basic information such as name, city, phone and requested services, but it does not have a way of getting an Estimated Unduplicated Non-Registered count of clients served. Each telephone contact is counted as a person served, regardless of how many times they call in a year. There were no written procedures for collecting and reporting the Estimated Unduplicated client count for Non-Registered services. [CCR 7250(2)(4)]

Corrective Action: Create procedures for collecting, reporting and ensure accuracy of Estimated Unduplicated Non-Registered count of clients served.

AAA Fiscal Review

In FY 0809 the Agency contracted with San Fernando Valley Interfaith Council, Inc. for III E Respite services. The Agency continued to contract with them in FY 0910 but did not include III E Respite services in the contract scope of work or contract budget. The Agency did not include III E Respite services in their FY 0910 CDA budget. The service provider invoiced the Agency for III E Respite services in FY 0910 and the Agency paid those invoices for about \$40,000. The Agency fiscal staff did not verify that the expenditures and payments were allowable and reimbursements were paid without verifying the provider's budget. [CDA Standard Agreement 213, Article 1A(4)]

Corrective Action: Ensure that III E Respite Care expenses erroneously reported to CDA in FY 0910 are corrected.

In sampling service provider documents such as ARRA budgets, Cost Control/Cash Control (monthly expenditure reports), and service provider closeouts, several were incomplete. Several were missing signatures and dates of completion. The AAA receives three copies of the report and distributes them to various units for processing. After receipt, the Fiscal and Audit Division input the fiscal data without reviewing for appropriate signatures. [OMB A-110, Subpart C, Section 21(b)(1)]

Corrective Action: Ensure that all service provider ARRA budget, Nutrition C-1 and C-2 budgets, and closeout reports are signed and dated by their legal representatives.

Both the Nutrition (NS) and Employment (ES) (ARRA) Stimulus programs were not included in the AAA Fiscal and Audit Division's service provider Fiscal Monitoring Tool. As of February 2010, the AAA has not performed any monitoring visits for FY 2008-09. It is appropriate to include all ARRA Stimulus expenditure activities in the tool to comply with Federal regulations. [OMB A-110, Subpart C, Section 21.6]

Corrective Action: Ensure that fiscal activities of both ARRA (Nutrition and Employment Stimulus) programs are added to the Fiscal and Audit Division's Fiscal Monitoring Tool immediately and proof of the update is submitted to CDA.

The AAA does not have a written policy for reporting assets when equipment is damaged or missing, or the knowledge of the CDA 248 "Request to Dispose of Property" process. When assets are no longer being used, are sold or missing, the CDA 248 must be used to inform the State of its status so that the assets can be removed from CDA's files. [OMB A-133, Subpart A, Section 105 and CDA Standard Agreement (CDA 213), Article VII, Property, Paragraph G]

Corrective Action: Ensure that there is a written policy for the handling of shortages or damaged property and that AAA staff are aware of the use and

knowledge of the CDA 248 when equipment is purchased at the AAA and service provider locations.

The CDA 32 “Report of Project Property Furnished/Purchased with Agreement Funds” was received timely at CDA, however it did not include existing prior inventory. The purpose of the CDA 32 is to acknowledge current assets, and to remove assets that are no longer used. CDA’s Area Plan contract requires that current and prior assets be reported. [CDA Standard Agreement (CDA 213), Article VII, Property, Para. F]

Corrective Action: Ensure that the CDA 32 is submitted to CDA with a complete listing of all currently used assets; assets used by the AAA or their service provider that were purchased through any current or prior year agreement using CDA funds.

Specific Program Reports—Older Americans Act Programs

Title III B—Information and Assistance (I&A)

I&A staff members are not consistently completing follow-ups and documenting outcomes of referrals when clients are linked to services.
[CCR 7527, 7533, 7537, and 7545]

Corrective Action: Ensure adequate staff resources are allocated to complete and document a follow-up outcome for each client that is referred to a needed service, within 30 days of the referral, to ascertain if the individual’s service needs were met.

Days and hours of operations are not included in all public information on brochures/directories of Older Americans Act Programs. [CCR 7531(b)(2)]

Corrective Action: Ensure days and hours of operations are included in all public information on brochures of older Americans Act Programs

Title III C—Elderly Nutrition Program (ENP)

The contracts and Requests for Proposal (RFP) language refers to Recommended Daily Allowances (RDA) rather than Dietary Reference Intakes (DRI). References to the RDAs must be replaced with DRIs. Contract and RFP language must reflect the current appropriate laws that pertain to the services provided.
[CCR Section 7638.5]

Corrective Action: Ensure the Title III C 1&2 contracts and Request for Proposals (RFP) refer to the Dietary Reference Intakes (DRI) rather than the Recommended Daily Allowances (RDA).

HDM reassessments are not being completed as required. Reassessment of need must be completed quarterly with at least every other assessment completed in the home. Each reassessment shall be noted in the client files. Ms. Estrada discussed methods of efficiently completing all of the assessments required with Ruben Vega, Bernardi

Center's C-2 Coordinator. An efficient system is to follow the HDM routes when providing in-home assessments; the clients are clustered together saving fuel and time. Each route can be reviewed either by a home visit or telephone call on a quarterly schedule that clearly demonstrates that all assessments will be completed annually. [CCR Section 7638.3 (a) (4)]

- The Bernardi Centers' Title III C-2 client files did not include up-to-date reassessments. Of 10 files reviewed on site none included up-to-date reassessments.
- The Jewish Family Services Title III C-2 client files did not have any phone call assessments recorded. The program was completing two in-home assessments each year but they are not meeting the requirement to provide quarterly assessments.

Corrective Action: Ensure that all quarterly reassessments for Home Delivered Meal participants are completed and included in each participants file at the Bernardi Multipurpose Center and at the Jewish Family Services.

Title III E—Family Caregiver Support Program (FCSP)

According to the AAA, a purpose of the planning process for the 2009-12 Area Plan was to expand participation of older adults and caregivers. However, in reviewing the AAA's collaboration with PSA 19 on a large-scale needs assessment of older adults, the survey gathered input only from seniors. As a result, the community assessment of caregiver assessed needs was based on the following: the perspective of the care receivers, seniors caring for an elder, or older relatives caring for a child. [OAA 306(a) 373(a), and CCR 7300]

Corrective Action: Ensure the Area Plan process addresses the need for, and prioritization of, FCSP services when fulfilling the following AAA planning steps for the two FCSP eligible populations and the five federally-required support service components:

- PSA community needs assessment (including any caregiver survey results, key informant feedback, and demographic and performance data analyses);
- Inventory of existing resources and related service quality, availability, and geographical constraints;
- Identification of other delivery systems whose service components meet OAA requirements to the extent that the AAA does not intend to budget additional Title III E funding (e.g., respite care);
- Analysis of gaps between the FCSP eligible population's assessed need and existing caregiver support resources;
- Determination of FCSP priorities within these gaps for OAA funding; and proposed type and level of the prioritized services to be included the Area Plan Budget and FCSP Service Unit Plan.

The 2009-10 awarding of \$130,877 to Mexican American Opportunities Foundation and \$100,000 to Partners in Care did not result from either a competitive bid process or a documented analysis justifying noncompetitive awards. A similar procurement process was followed in the previous fiscal year. The awarding of \$230,877 in Title III E funds did not meet minimum State and federal requirements. [CCR 7352(a), CCR 7360, and 45 CFR 74.40-46]

Corrective Action: Complete a competitive bid process or sole-source justification for all FCSP-contracted.

The AAA contracted with eight adult day programs to provide FCSP Caregiver Support Services. According to the AAA Planning Division staff, procurement of these services was related to a RFP process for funding adult day programs with Community Development Block Grant (CDBG) dollars. The AAA decided that each adult day program selected through the CDBG process would automatically receive an additional set amount of \$14,850 in Title III E funds to provide support groups for family members of those attending the adult day program. The RFP contained the technical requirements for CDBG, but did not provide similar information for FCSP. The only RFP reference to FCSP was in Attachment 3 regarding Minimum Units of Service – Family Caregiver Support – Support Groups 100 hours. The available Title III E funding of \$118,800 was not mentioned in the RFP. Title III E funds was indirectly released through a RFP process that did not contain any FCSP technical requirements other than minimum units of service. [CCR 7354(b)(5)]

Corrective Action: Incorporate FCSP criteria (client eligibility, service standards, and available federal funding) within the Adult Day Program RFP.

The AAA's procurement procedures must be consistent with the Area Plan goals, proposed service performance expectations, and budgeted costs. The AAA Area plan FCSP goals/objectives and budget are specified in accordance with the five federally-required support service categories. An RFP for procurement of FCSP services shall be in accordance with these federally-required specifications. The AAA's RFP for "Family Caregiver Care Management Program for Those Caring for Someone with Dementia" did not break down the \$170,000 release of Title III E funds for Caregiver Information Services, Access Assistance, Support Services, and Respite Care. The RFP Minimum Units of Service did not use these federally-required support service categories. As a result, RFP applicants did not know how much funding was available within each of federally funded service categories. [CCR 7354(b)(3)]

Corrective Action: Specify within the RFP the projected level of available FCSP federal funding in accordance with five federally-required support service categories.

For Fiscal Year 2009-10 the AAA allocated Title III E funds utilizing former detailed budget categories, rather than in accordance with the broader five federally mandated support service components. This resulted in renegotiated contracts containing

proposed performance levels in no longer applicable budget categories. The AAA was aware of the error and adjusted FCSP performance outcomes to meet current requirements before submitting data to CDA, but AAA grantees may have continued to deliver FCSP services in accordance with no longer applicable standards. [CDA PM 08-03, OAA 373(e)(1), and OAA 373(b)]

Corrective Action: Award Title III E funds in accordance with the broader five federally mandated support service components, and ensure grantees deliver services in accordance with these federal categories (report performance outcomes utilizing CDA's more specific FCSP Service Matrix).

The non-Federal share of matching cash and in-kind contributions to be accounted and reported only for FCSP activities and services specifically provided in accordance with Title III E. When reporting, in-kind match will count only if the provider receiving these contributions would have to pay for them; the payments would be allowable FCSP costs. The Bet Tzedek Legal Services reported total costs of \$521,028 for the provision of legal-related Supplemental Services in FY 2009-10. The Bet Tzedek cash match of \$324,553 for the awarded federal share of \$196,000 inordinately exceeded match requirements. FCSP performance output has to be reported for the total expenditures, not just the Title III E portion of funding. However, FCSP Legal Assistance output for this period was documented in NAPIS as 2,155 hours (or an extremely high average of almost \$250 per hour). Total expenditures for this federal category did not appear to correlate with actual FCSP performance output. [OAA 301(d)(1) and 45 CFR 92.24(b)(6)]

Corrective Action: Ensure required match budgeted for FCSP are allowable costs associated with FCSP-eligible services provided to FCSP-eligible caregivers.

Federal cost principles allow AAAs and their contracted providers to spread operating costs between programs and organizations, as long as each program pays its fair share of costs in accordance with the benefits received. FCSP funds are to supplement, and not supplant, the costs of other already existing AAA services and operations. For FY 2009-10, Bet Tzedek Legal Services was awarded \$215,000 in Title III B funds to provide 5,238 units (hours) of legal services, and \$196,000 in Title III E funds to provide 2,155 hours of legal services. The AAA awarded almost the same level of funding for FCSP performance output expected at only 40 percent of Title III B expectations. In a similar situation, the AAA could not provide documentation for budgeting the prorating of costs between Title III B and III E for Trilogy web-based resources. Title III E funds could be used to offset cost of Title III B services. [OAA 374]

Corrective Action: Disburse federal funds to contracted providers based on actual benefits expected to be received by FCSP caregivers.

Data shall be collected and maintained in order to evaluate and compare the effectiveness of support services provided through Title III E funding. Data must be

collected in accordance with standards set by CDA in order to meet U.S. Administration on Aging NAPIS requirements. According to statements made by AAA staff, their understanding of who is a FCSP-eligible I&A contact was any caller other than a senior. They were not familiar with the FCSP Service Matrix criteria. As a result, AAA reported Caregiver Information and Assistance output did not reflect actual FCSP-eligible services. [OAA 373(e)(2)]

Corrective Action: Ensure I&A data performance tracking for FCSP is based on actual caregiving needs and caregiver resource information provided, per OAA caregiver definition and CDA's FCSP Service Matrix.

When FCSP activities and services are delivered in collaboration with other programs, the AAA and/or its grantees shall have a system in place for distributing the fair share of costs for each program in accordance with benefits received. They are also to maintain documentation to support the reasonable proportion of costs. Documentation was not available to support the prorating of AAA direct Information and Assistance services between Title III E and other funding sources. Title III E funding covered almost all of the AAA's direct I&A program costs for a service identified on the AAA website as serving both seniors and caregivers. [2 CFR 230 – Appendix A(4)(a)(2) and OMB Circular A-122]

Corrective Action: Reassess the AAA Cost Allocation Plan for prorating AAA direct I&A costs to ensure the FCSP share of costs is based on FCSP-eligible I&A benefits received (Title III E versus Title IIIB).

Title V—Senior Community Services Employment Program (SCSEP)

The AAA is required to pay for enrollment and orientation. [CFR 20:641-565, SCSEP Data Collection Handbook (Rev.5 8-23-07) topic 38 Community Service Employment]

Corrective Action: Develop a procedure to include enrollment and orientation as a paid activity.

Recertifications are behind due to the priority of filling new positions and a reduction in staff hours. [CFR 20:641.505]

Corrective Action: Develop a system to determine which participants are due for recertification and complete the recertification in a timely manner.

Due to legal issues, the MOU has not been completed and is waiting signature by the LWIB. [CFR 20:641.220, 641.230, 641.240, Title V Community Service, Senior Opportunities Act, Section 511(b) (2)]

Corrective Action: Ensure the MOU is signed by May 30, 2010. Submit a signed copy of the MOU to CDA

Several files are missing a safety evaluation of host agency sites. [CFR 20:641-535, and OAA 502(b)(1)(j)]

Corrective Action: Ensure a safety evaluation is completed for each participant's host agency assignment.

Specific Program Reports—Older Californians Act Programs
Health Insurance Counseling and Advocacy Program (HICAP)

A review of Quarterly Aggregate HICAP Reports from PSA 25 shows a volume of Quick Non-Counseling calls that is low when compared to other PSAs with less Medicare population. It was determined that many calls, although meeting the definition of quick as provided by CDA, were not noted as Quick Non-Counseling. The HICAP Instructions for the Quarterly Aggregate HICAP Report sets out the definition as follows: Quick Non-Counseling Calls – This category is the total of all information only calls during the reporting period that did not involve counseling nor required a Counselor, and for which no Intake/Counseling was initiated. [CDA Form 1005 (7/29)]

Corrective Action: Correct the reporting of Quick Non-Counseling calls by applying the definition of quick calls from the Quarterly Aggregate HICAP Report and consulting with CDA staff.